

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S SECOND SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS MARTIN (PR/USPS-T-6: 13)

(February 23, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for
Docket No. N2012-1

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PR/USPS-T-6-13

In your response to PR/USPS-T6-3 (b) you state: "The trip-specific, capacity-utilization data contained in the "Plant to Plant Trips" spreadsheet in library reference USPS-LR-N2012-1/11 shows that there is excess capacity throughout the plant-to-plant transportation network". In response to PR/USPS-T6-4 (a) you state: "Truck capacity utilization is calculated from data that are uploaded to our transportation databases (Surface Visibility or Transportation Information Management Evaluation System ("TIMES"))).

- a. Please confirm that 'utilization' provided in USPS-LR-N2012-1/11 is the same as 'truck capacity utilization' you mention in your response to PR/USPS-T6-4 (a). If not confirmed, please explain the difference.
- b. Please confirm that you understand excess capacity as insufficient capacity utilization. If not confirmed please explain.